

Remarks

Claims 1-8 and 10-26 are pending. In response, Claims 1, 4, 13, 19, 20 and 26 are amended. No claims are canceled. No claims have been added. Thus, claims 1-8 and 10-26 are pending.

CLAIM REJECTIONS – 35 U.S.C. § 103

Claims 1-8 and 10-26 are rejected as being unpatentable over *Nenonen* in view of U.S. Patent No. 5,760,760 issued to Helms (*Helms*).

Independent Claim 1 recites:

1. An apparatus comprising:
a set of registers where each register has a corresponding to computed brightness value to store data indicating a number of pixels of an image having respective computed brightness values, each register having an associated saturation threshold value; and
an image brightness agent communicatively coupled with the set of registers to determine whether a register is saturated and, for each register that is saturated to redistribute computed brightness values to a closest non-saturated register and if none of the registers is saturated to adjust image brightness to compensate for backlight intensity that is reduced to operate the apparatus in a low power mode, wherein the image brightness is adjusted to compensate for the reduced backlight intensity based on an ambient light level. (Emphasis added.)

While Applicant's argument here is directed to the cited combination of references, it is necessary to first consider their individual teachings, in order to ascertain what combination (if any) could be made from the cited references.

As correctly recognized by the Examiner, *Nenonen* does not expressly disclose adjusting image brightness and corresponding backlight intensity based on an ambient light level (see page 3, para. 2 of the Office Action mailed 5/16/07); as a result, the Examiner cites *Helms*. The Examiner relies on column 3, line 6 to column 4, line 5 of *Helms* to rectify the deficiency of

Nenonen to teach or suggest adjusting image brightness and corresponding backlight intensity based on an ambient light level, as in Claim 1.

Helms is generally directed to an intelligent LCD brightness control system for automatically adjusting the brightness level of an LCD based on the ambient lighting conditions of the environment in which the LCD is being operated. (See Abstract.) As explicitly disclosed by *Helms*:

A backlight driver circuitry 213 outputs an appropriate brightness control signal for adjusting the brightness level of the LCD 12 in accordance with the levels indicated by the user-selected brightness level and an ambient light level indicated by a photo detector 14. (See col. 4, lines 1-5.) (Emphasis added.)

We submit that adjusting the brightness level of an LCD in accordance with the levels indicated by a user-selected brightness level and an ambient light signal generated by a photo detector 14, as disclosed by *Helms*, fails to teach or suggest an image brightness agent that is to adjust an image brightness to compensate for backlight intensity that is reduced to operate an apparatus in a low power mode, as in Claim 1. Hence, neither the sections referred to by the Examiner nor any other disclosure in *Helms* teaches or suggests adjusting image brightness to compensate for backlight intensity that is reduced to operate an apparatus in a low power mode, as in Claim 1.

Furthermore, the combination of *Nenonen* in view of *Helms* fails to teach or suggest that the image brightness is adjusted to compensate for the reduced backlight intensity based on an ambient light level, as in Claim 1.

Hence, no combination of *Nenonen* in view of *Helms* could teach or suggest “an image brightness agent... to redistribute computed brightness values to a closest non-saturated register

and if none of the registers is saturated to adjust image brightness to compensate for backlight intensity that is reduced to operate at a low power mode, much less that the image brightness is adjusted to compensate for the reduced backlight intensity based on an ambient light level, as in Claim 1.

For each of the above reasons, therefore, Claim 1, and all claims which depend from Claim 1, are patentable over the combination of *Nenonen* in view of *Helms* as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §103(a) rejection of Claims 1-8 and 10-12.

Each of Applicants other independent claims include features similar to those highlighted above with reference to Claim 1. Therefore, all of Applicants other independent claims, and all claims which depend from them, are also patentable over the cited art for similar reasons. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §103(a) rejection of Claims 13-26.

DEPENDENT CLAIMS

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicant's silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending (1) are in proper form, (2) are neither obvious nor anticipated by the relied upon art of record, and (3) are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being submitted electronically via EFS Web on the date shown below to the United States Patent and Trademark Office.


Elaine Kwak

8/16/07
Date